

DAMES & MOORE



ADDENDUM CLOSURE PLAN FOR BUILDING 39 COLUMBIA BUSINESS CENTER VANCOUVER, WASHINGTON

JUNE 19, 1990 JOB # 17809-001-005



PORTLAND, OREGON

1750 S. W. HARBOR WAY, SUITE 400, PORTLAND, OREGON 97201 (503) 228-7688 FAX NO. (503) 223-6083

June 19, 1990

U.S. Environmental Protection Agency Region 10 RCRA Compliance Section 1200 Sixth Avenue Seattle, Washington 98101

Attention: Mr. David Tetta

Addendum Closure Plan for Building 39 Columbia Business Center Vancouver, Washington

Dear Mr. Tetta:

This addendum letter is to be attached to the <u>Closure Plan for the Container Storage Area- Buildings 17 and 39- 2000 East Columbia Way, Vancouver, Washington, report (Job Number 17808-001) dated December 29, 1988. That report provided certification of the closure by an independent registered professional engineer.</u>

This addendum is intended to address the Environmental Protection Agency's (EPA) and Washington Department of Ecology's (WDOE) concerns with regard to lead contamination of soil in an area adjacent to Building 39 (new building number 43). EPA's concern was specifically addressed in a letter to Mr. Doug Hardesty (Hillman Properties NW) from Mr. Michael Gearheard (EPA) dated October 19, 1989 (see Attachment 1). It was also discussed in a meeting between EPA and Hillman Property representatives, held in Seattle, Washington in October of 1989. EPA staff stated that WDOE personnel had collected some soil samples adjacent to a loading dock door on the northwest corner of Building 39. These samples were said to contain 300 mg/l lead (see Attachment 2). The lead in the soil samples is believed to have come from the previous occupants of the building, Cascade Tempering. Cascade Tempering moved from Building 5 to Building 39 just before going out of business. They used metal-based compounds in the glazing of glass and had numerous drums stored in Building 39. The containers and contents were properly disposed by Hillman, as stated in our original Closure Report. The soil contamination detected outside the loading dock door was probably the result of spilled glazing compound being swept out the door. This loading dock door is located on the north wall of Building 39, near the center of the wall.

Through visual inspection, Washington Department of Ecology initially identified a 6-foot by 9-foot area beneath the door as contaminated with lead. An EPA letter, dated October 19, 1989, states that the 6-foot by 9-foot area be excavated to a depth of 6 inches. Dames & Moore and a remediation contractor, CECon, recently completed the removal of the lead-contaminated soil from the loading door area behind Building 39.

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The phased cleanup effort was accomplished in four steps between the initial excavation of April 24, 1990, and the final excavation of June 4, 1990. The four steps consisted of excavating a suspected area of contamination, and collecting confirmation samples in the excavation walls and floors. If the floors and walls of the excavation contained lead in concentrations above background levels, further excavation ensued. Figure 1 shows the final excavation limits and Table 1 shows the results of the final soil sampling of the walls and floor of the excavation.

TABLE 1

Sample Location	Sample Depth (in feet)	Lead Concentration (in ppm)	Sample ID (Attachment 3)
North Wall	0-2	19	SS-392-1
West Wall	0-3	40	SS-394-2
East Wall	0-3	16	SS-393-3
West Half Floor	3	5	SS-393-4W
East Half Floor	3	31	SS-393-4E
West Half Floor	2	1.2	SS-394-3
East Half Floor	2	1.6	SS-394-4

The original volume identified by WDOE was thus enlarged to 13 feet by 36 feet by 2-3 feet (see Figure 1). Nearly 26 cubic yards of lead-contaminated soil has been removed from the excavation behind Building 39. The majority of the excavated soil was included in shipments of lead-contaminated soil to ESI-Idaho from Building 5 (the original site of Cascade Tempering). A small amount (<2 yards) of contaminated soil (<470 ppm total lead and <0.01 ppm leachable lead) remains in a covered pile near Building 5 awaiting disposal. The analytical results are attached.

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Background lead levels for segregated depth levels as defined in the Closure Plan critical values for segregated depth intervals are as follows:

- depth 0-1 feet 135.82 ppm, and
- depth 1-3 feet 32.85 ppm.

Based upon these background levels, lead contamination behind Building 39 has been successfully removed. The manifests for the disposal of the soil at ESI are included in Attachment 4.

CERTIFICATION OF CLOSURE

As an independent registered professional engineer engaged to certify closure operations pursuant to 40 CFR 265.115 and WAC 173-303-610, I hereby attest, based on my visit to the sites, a review of pertinent closure information/operations, and the closure plan submitted by Hillman Properties Northwest, Inc. on September 16, 1988, and amended in accordance to EPA letter of October 19, 1989, that the container storage areas in Building 39 and Building 17 and the area to the north of Building 39 have been closed in accordance with the specifications of the approved Closure Plan.

A. DUA

Very truly yours,

DAMES & MOORE

John M. Dumeyer, P.E.

Senior Environmental Engineer

Kin &Marce

Kim L. Marcus, Project Manager

Attachment:

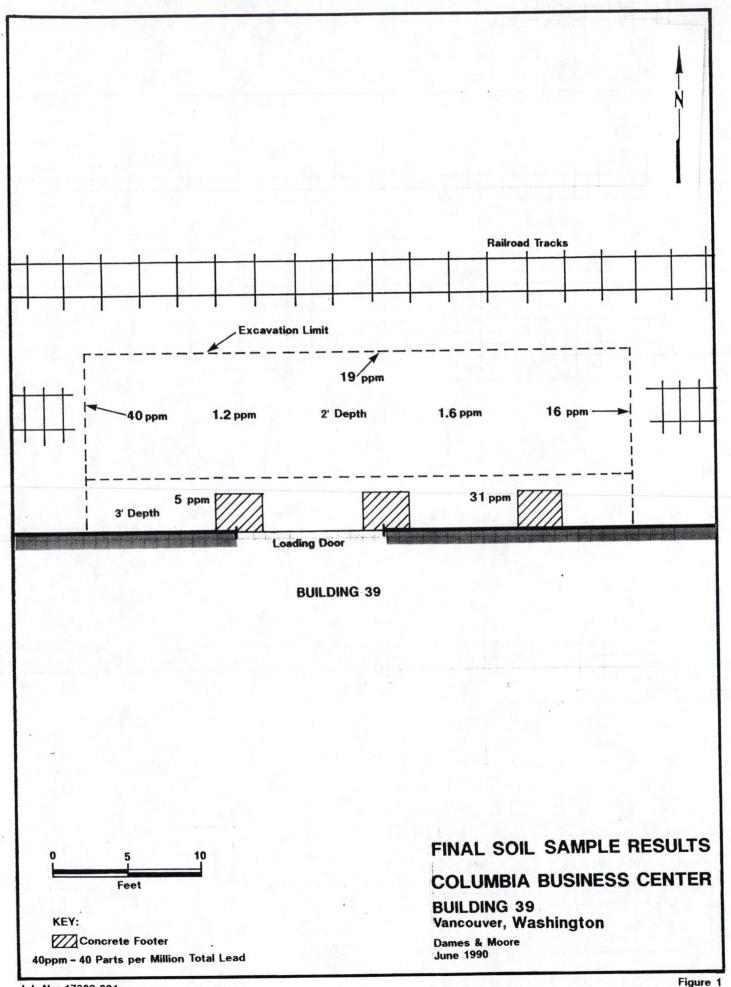
Figure 1 - Final Excavation Limits

1 – Letter from EPA to Hillman Properties

2 — WDOE Analytical Results3 — Laboratory Analytical Results

4 — Manifests

G-17809-01.03 JMD:KLM:tnb 17809-001-005



Job No: 17809-001

Attachment 1

Letter from EPA to Hillman Properties

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X



1200 SIXTH AVENUE SEATTLE, WASHINGTON 98101

OCT 19 1989

RECEIVED OCT 2 3 1989 Alled

REPLY TO ATTN OF:

W00

Doug Hardesty Hillman Properties NW 2000 E. Columbia Way Building 54 Vancouver, Washington 98661

Dear Mr. Hardesty:

This is to inform you that the U.S. Environmental Protection Agency (EPA) has determined that you have completed the closure in accordance with the approved closure plan of the hazardous waste storage units at building 39 and 17 in the Columbia Industrial Park. However, the Washington Department of Ecology (Ecology) has informed me that high levels of lead were found in soil samples they took between the railroad tracks and building 39. Therefore, you will need to address this problem before we can downgrade your regulatory status.

To address the contamination EPA will require that you remove all of the gray colored material Ecology noted on the ground between building #39 and the Railroad tracks near the loading dock door of building #39. The soil should be excavated to a depth of six inches below the gray material. The excavated material must be collected and managed as hazardous waste. Once excavation is complete samples should be taken in each hole and analyzed for EPA Toxicity for lead to assure that the cleanup is complete. Cleanup should be completed and documentation submitted to EPA within 60 days of receipt of this letter. If this is not done it will be necessary to take further enforcement action against your facility.

If you have any questions please contact Jack Boller at (206) 753-9428.

Sincerely,

Michael F. Gearheard, Chief Waste Management Branch

Enclosures

cc: Jack Boller, EPA Lisa Stone Attachment 2
WDOE Analytical Results

Washington State Department of Ecology Sample/Stoject Analysis Bessits ()

Account! 24005

Project. DOE-1339 AVRCORACE COTOMSTER

Laboratory: 2cology, Manchester

Semple No: 49 287810

Description: BLD439-2

source: Industrial Implant Sators

Officer: RYP

Begin Date: 81/45/18 :

Surro	Hetals - EP Toxicity	IFT-SLd Result	Unita
ष्	Recury Mg-Tetal	0.11 *	ug/1
<u>}</u>	Netals - EF Toxicity	tpr-sld	
	- Metrix Spike #1	Result	Drits
ECOLOGY	Mercary My-Tetal	98	1 Recov
	Notals - EP Texicity Natrin Spike #2	EPT-Sld Result	Unita
	Mersury Ng-Total	191	1 Recov
8	+		
92:58	Retals - EP-Tex, SCP	EPT-Eld Rosell	Umits
86/58/18	Arenic As-Tetal Battum Sa-Tetal Cadmiss (d-Total Chromium (r-Total Land Fb-Total; Silver Ap-Total; Solenium Se-Tatal EPTOK Sclids	5000 212 4 156 4 1460 304646 5 5000 1000	ug/1 5/00* ug/1 212 ug/1 196 ug/1 200 ug/1 200 ug/1 50° ug/1 50° Fercent
		216.	

Attachment 3

Laboratory Analytical Results



June 13, 1990

Dames & Moore 1750 SW Harbor Way, Suite 400 Portland, OR 97205

Attn: Kim Marcus

JOB #17809-001 Re: PEL #90-1518

Enclosed is the lab report for your samples which were received on June 4, 1990.

I. Sample Description

Three Soil Samples

The samples were received under a chain of custody.

The samples were received in containers consistent with EPA protocol.

II. Quality Control

No project specific QC was requested. In-house QC data is available upon request.

III. Analytical Results

Test methods may include minor modifications of published methods such as detection limits or parameter lists. Solid and waste samples are reported on an "as received" basis unless otherwise noted.

Compounds not detected are listed under results as ND.

Sincerely,

Howard Holmes Lab Manager

Jennifer Shackelford Jennifer Shackelford

Chemist



PEL REPORT NUMBER:

90-1174

CLIENT:

Dames & Moore

JOB REFERENCE:

17809-001

DATE:

ITEMS:

May 3, 1990 Eight Soil Samples

Total Metals per EPA 3050, 7420 METHOD: Results in mg/kg (ppm)

Sample I.D.	Lead
SS-392-1	19
SS-392-2	300
SS-392-3	680
SS-392-4	980
SS-392-4T	470
SS-CIEE-1	7
SS-CIEE-2	15
SS-CIEE-3	16
Lab Blank	ND
Detection Limit	1

METHOD: E.P. Toxicity per EPA 1310, 7420
Results in mg/L (ppm)

Sample I.D.	Lead
SS-392-1	ND
SS-392-2	ND
SS-392-3	1.1
SS-392-4	1.3
SS-392-4T	0.1
Lab Blank	ND
Detection Limit	0.1



PEL REPORT NUMBER:

CLIENT:

90-1225

Dames & Moore

JOB REFERENCE:

17809-001

DATE:

May 16, 1990

ITEMS:

Four Soil Samples

METHOD: Total Lead per EPA 3050, 7420 Results in mg/kg (ppm)

Sample I.D. Lead 76 SS-393-2 SS-393-3 16 5 SS-393-4W SS-393-4E 31 Lab Blank ND Detection Limit 1



PEL REPORT NUMBER:

90-1518

CLIENT:

Dames & Moore

JOB REFERENCE:

17809-001

DATE:

June 13, 1990

ITEMS:

Three Soil Samples

METHOD: Total Lead per EPA 3050, 6010 Results in mg/kg (ppm)

Sample I.D.	<u>Lead</u>
SS-394-2	40
SS-394-3	1.2
SS-394-4	1.6
Lab Blank	ND
Detection Limit	0.5

Attachment 4

Manifests

MAILING ADDRESS: P.O. Box 16217 Boise, Idaho 83715-6217 (208) 384-1500

GENERATOR WASTE PRODUCT QUESTIONNAIRE **ENVIROSAFE SERVICES OF IDAHO, INC.**

FACILITY ADDRESS 101/2 Miles NW Grandview Missile Base Road Grandview, Idaho 83624

U.S. EPA ID. Number IDD073114654	☐ NEW ☐ RENEWAL
SECTION A - GENERATOR DA	Envirosafe Services Only
Generator COLUMBIA BUSINESS CENTER	Application #
Address 2501 SE COLUMBIA WAY # 240	PCN
City/State VANCOUVER WA ZIP 98661	CUST #
Tech. Contact CHRISTINE WAMSLY TEL 206-693-3644	. DIRECT ACES
U.S. EPA IDENTIFICATION NUMBER	BILLING BROKER
WAD9809797	Sales Zone Code
Billing/Broker NORTHWEST ENVIROSERVICE INC.	TAX YES NO
Address 1700 AIRPORT WAYS.	Cell 5 Waste
City/State SCATTLE WA ZIP 98/3	MANIFEST
Billing Contact DENNIS K. MEANGHARL 206-622-10,	CERTIFICATION DECUMPED
SECTION B - WASTE CHARACTER L. Common Name for This Waste: LCAO CONTAMINATO SOIL	
2. Process Generating This Waste: SITE REMEDIATION	
Process Generating This waste:	
3. Annual Quantity: 1 Tons 2 Yards 3 Gallo	ns 3.1 ZO 4 Drums
Shipment Duration: 5. Shipment Mode:	
1 □ Permanent (1 Year or Longer) 1 □ Bulk 2 □ Palletized Boxes 3	□ Woven Cloth Bags 4 Metal Drums
2X Temporary (Less Than 1 Year) 5□ Other:	
As Shipped To ESII I.Is waste shipped different than waste as produced at initial point of gene If yes, must include Attachment A to describe waste as initially generated.	ration? 1□ YES 2X NO
2. Describe physical state at 70°F 1 Dry Solid 2□ Damp Solid 3□ Powder 4□ Semi-Solid/Gel 50	□ Flowable Liquid 6□ Labpack
7 Other 21 Baratamatar BSI	3.2 % Solids @105°C:
3. Describe Load Bearing Strength at 70° F: 3.1 Penetrometer PSI:	/00
TA Solid/Rigid 2E Studge SE Wednesday	5. Apparent Density of Waste
4. Describe Physical Appearance of Waste (Include Color): Brown Sou	2200 Lb./Cu. Yai
6. Flash Point:	6.1 Actual Flash Pt: 6.2 Combustible:
1□ <70°F 2□ 70-100°F 3□ 101-140°F 4□ 141-200°F 5风 >200°F	
7. pH Range (50% Slurry in Distilled Water for Solid) 7.1 Actual pH (S	i.U.):
4-10	
8. Describe Odor of Waste: 9. Viscosity (Li	quids): Similar to
1 None 2□ Slight 3□ Strong 1□ Water 2	☐ Motor Oil 3☐ Honey
Describe □ Other	JA.
O. Debris in Waste: A Yes 2□ No Describe Rocks, wood ect	
1. Potential for presence/Separation of incidental liquids during transport: 1□ Yes 2♥ No	

ase print or type. (Form designed for use on elite (12-pitch) typewriter.)	62,000		No. 2050-0035 Expires 5-30-88
UNIFORM HAZARDOUS 1. Generator'S US EPA ID No. WASTE MANIFEST WAD 19809719	Manifest	of I law.	ation in the shaded areas t required by Federal
3. Generator's Name and Mailing Address COLUMBIA BUSINESS CENTER 2501 SE COLUMBIA WAY # 240		A. State Manifest Do B. State Generator's	
4. Generator's Phone (206) 693 - 3644 VANCOUV. 5. Transporter 1 Company Name 6.	US EPA ID Number	C. State Transporter	
JACK GRAY TRANSPORT 7. Transporter 2 Company Name 8.	4 25 3 48 7 3 US EPA ID Number	E. State Transporter	
9. Designated Facility Name and Site Address 10.	US EPA ID Number	F. Transporter's Phor G. State Facility's ID	the same of the sa
ENVIROSAPE SERVICES OF IDAHO, INC	· cv	H. Facility's Phones	1500
	173/1/48/4	ainers 13.	14. Unit
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Nu	No.	Type Quantity	Wt/Vo Waste No.
Hazardous waste solid		234	j
Hazard class - ORME	111		
Hazardous waste solid Hazard class - ORME EPA waste ID no Door	8		
Dot waste ID no, - NA91	189		
15. Special Handling Instructions and Additional Information NA			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this proper shipping name and are classified, packed, marked, and labeled, and are according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce conomically practicable and that I have selected the practicable method of treat future threat to human health and the environment; OR, if I am a small quantity the best waste management method that is available to me and that I can afform Printed/Typed Name COLUMBIA BUSINESS CENTERSign CHRISTINE WAMSLEY Terry Shan level.	o in all respects in proper cond uce the volume and toxicity of atment, storage, or disposal cur regenerator, I have made a good rd.	waste generated to the	degree I have determined to be thich minimizes the present and my waste generation and select
	nature /	ac/	Month Day Year
18. Transporter 2 Acknowledgement of Receipt of Materials	Mark	II was	101412161916
Printed/Typed Name Sign	nature		Month Day Year
19. Discrepancy Indication Space 19. Discrepancy Indication Space 11. Space	. — Фенсп т-Е, NA9189 (D	ristinė Wan 008)	nsley 4/27/90 @ 10:30
107 13a. 23 14a. V 20.Facility Owner or Operator: Certification of receipt of hazardous materia			
	nature Nancy Ma	` `	Month Day Year
EPA Form 8700-22 (Rev. 9-86) Previous editions are obsolete.	1	Maria Maria Maria Maria	

Madariete

10196171916